

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.
and Technovative Media, Inc.,

Debtors.¹

Chapter 11

Bankr. Case No. 23-10763 (MDC)

Stream TV Networks, Inc., *et al.*

Adv. Case No. 23-00057 (MDC)

Plaintiffs

v.

Shadron L. Stastney, *et al.*

Defendants.

**SEECUBIC, INC.'S SECOND AMENDED
WITNESS AND EXHIBIT LIST FOR HEARING**

I. WITNESS LIST

SeeCubic, Inc. (“SeeCubic”) may call the following witnesses at the hearing on Debtors’ Motion for Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction (ECF No. 30): (i) Shadron Stastney; (ii) Ian Liston; (iii) any witness listed by Debtors or any other party; and (iv) any witness necessary for impeachment and/or rebuttal purposes, including but not limited to those rebuttal witnesses identified by counsel to SeeCubic via email on November 20, 2023.

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

II. EXHIBIT LIST

In addition to the below listed exhibits, SeeCubic reserves the right to utilize any exhibit listed on Debtors' exhibit list, the exhibit list of any other party, or documents on the docket of the above-captioned or related matters. SeeCubic also reserves the right to utilize any document not listed on the below Exhibit List for impeachment and/or rebuttal purposes.

EXHIBIT NO.	DESCRIPTION
1	Corporate Organizational Chart of the Debtors (Ch. 11 ECF No. 48-5) (ECF No. 47-1)
2	Debtors' Patent Portfolio Filing (Ch. 11 ECF No. 48-1) (ECF No. 47-2)
3	Technology License Agreement (Philips) (ECF No. 47-3)
4	Amendment to Technology Licensing Agreement (Philips) (ECF No. 47-4)
5	Docket, <i>Rembrandt v. Technovative</i> (ECF No. 47-5)
6	Complaint, <i>Rembrandt v. Technovative</i> (ECF No. 47-6)
7	SeeCubic's Answering Brief in Opposition to Rembrandt's Motion for TRO and Preliminary Injunction and Brief in Support of SeeCubic's Cross Motion to Dismiss Plaintiff's Complaint, <i>Rembrandt v. Technovative</i> (ECF No. 47-7)
8	Email Chain From Ian Liston (ECF No. 47-8)
9	Protocol to Operate SeeCubic BV & Ultra-D & Coöperatief U.A. Stream TV BV (ECF No. 47-9)
10	Proposed Terms for Bridge Loan Agreement (2023) (ECF No. 47-10)
11	Dutch Continuance Request (Ch. 11 ECF 286-4) (ECF No. 47-111)
12	Dutch Grant of Continuance (Ch. 11 ECF 286-5) (ECF No. 47-12)
13	Denial of Request to Move Oral Hearing Forward (Ch. 11 ECF No. 286-16) (ECF No. 47-13)
14	Letter Dismissing Directors (Ch. 11 ECF No. 286-14) (ECF No. 47-14)
15	Letter from S. Stastney re Draft Written Resolution (Ch. 11 ECF No. 286-15) (ECF No. 47-15)
16	Judgment, Summary Relief Proceedings Order (June 2023) (ECF No. 47-16)
17	Email Forwarded from C. Michaels Re_ [EXT] FW_ HM project (ECF No. 47-17)
18	Judgment, Summary Relief Proceedings (September 2023) (ECF No. 47-18)

EXHIBIT NO.	DESCRIPTION
19	Email from D. Bowker Re [Ext] RE Request from Seecubic, Inc. re Dell PowerEdge M640 Servers (ECF No. 47-20)
20	Oct. 5, 2022 Demand Letter for Transfer of Stream/Technovative Assets From SeeCubic to Stream TV (ECF No. 47-21)
21	Oct. 7, 2022 Response Letter to Demand for Transfer of Stream/Technovative Assets From SeeCubic to Stream TV (ECF No. 47-22)
22	Email from B. David Re: Stream TV (ECF No. 47-23)
23	Email from B. David Re: Stream TV (ECF No. 47-24)
24	Email from B. David Re: Stream (ECF No. 47-25)
25	Email from B. David Re: Stream SeeCubic Request to Transfer Websites (ECF No. 47-26)
26	Email from M. Brumme Re: Stream TV (ECF No. 47-27)
27	Email from A. Dupre Re: Rule 408 - Discussion with counsel only (ECF No. 47-28)
28	Letter from J. Berkenbosch (ECF No. 47-29)
29	Declaration of S. Stastney (ECF No. 47)
30	Declaration of M. Rajan In Support of Debtors' Motion for TRO, Preliminary Injunction & Permanent Injunction (ECF No. 30-5)
31	Declaration of C. Robertson In Support of Debtors' Motion for TRO, Preliminary Injunction & Permanent Injunction (ECF No. 30-6)
32	Settlement Agreement between Stream TV and Rembrandt (ECF No. 30-3)
33	Settlement Amendment between Stream TV and Rembrandt (ECF No. 30-4)
34	Rembrandt Licensing Covenant (ECF No. 30-5)
35	Second Amended Complaint, <i>Stream TV v. Stastney</i> (D. Del.)
36	Certificate of Service Re Summons and Complaint (ECF No. 14)
37	SeeCubic's Notice Regarding Proceedings In The Netherlands (Ch. 11 ECF No. 286)
38	Written Resolutions of General Meeting of SeeCubic B.V.
39	Declaration of M. Rajan In Support of Stream's Petition Support Emergency Relief and First Day Motions (Ch. 11 ECF No. 48)
40	M. Rajan Whatsapp Messages (Ch. 11 ECF 286-6)
41	Visual Semiconductor, Inc. Website, "Our Team"
42	Touch Taiwan 2023 Exhibitor List

EXHIBIT NO.	DESCRIPTION
43	Touch Taiwan Photos
44	Email Chain Between S. Stastney and P. Theune
45	Stream TV Schedule A/B (Ch. 11 ECF No. 52)
46	Technovative Schedule A/B (Technovative Ch. 11 ECF No. 47)
47	Seecubic.com
48	Email from L. Serrarens Re: Concerning SeeCubic B.V.
49	Email from D. Becht Re: URGENT: Request of Mr. Patrick Theune of SeeCubic B.V. to discuss with Mr. Liston the funds required by SeeCubic B.V.
50	Email from I. Liston Re: URGENT: Request of Mr. Patrick Theune of SeeCubic B.V. to discuss with Mr. Liston the funds required by SeeCubic B.V.
51	Series of emails from P. Theune and B. Barenburg Re: Stream/SeeCubic – Potential Injunction Breach – Remedial Action Requested
52	April 14, 2023, Hearing Transcript (Ch. 11)
53	April 25, 2023, Hearing Transcript (Ch. 11)
54	Declaration of Mathu Rajan in Support of Stream TV Networks, Inc. and Technovative Media, Inc. Motion for Entry of an Order: (1) Enforcing the Automatic Stay; (2) Directing the Turnover of Property of Debtors' Estate; and (3) Imposing Sanctions for Willful Stay Violations (Ch. 11 ECF No. 114-1)
55	Email from M. Dannenberg Re: SeeCubic
56	Notices of Advance (Exhibits to Ch. 11 ECF No. 158)
57	April 19, 2023, Email from M. Rajan to P. Theune
58	Seecubic.com whois lookup updated November 21, 2023
59	Historical Web Capture of the Seecubic.Com Site from June 22, 2022
60	Historical Web Capture of the Seecubic.Com Site from June 25, 2017
61	September 22, 2023, Hearing Transcript (Ch. 11)
62	October 6, 2023, Hearing Transcript (Adv. Pro.)
63	October 30, 2023, Hearing Transcript (Adv. Pro.)
64	August 16, 2023, Transcript of Remote Deposition of Christopher Michaels (Ch. 11)
65	Technology License Agreement between Philips and 3D Fusion
66	Email from Alexander Damvelt Re: license agreement 3D technology

SeeCubic reserves the right to supplement and/or amend the foregoing at any time.

Dated: November 25, 2023

Respectfully submitted,

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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